REMARKS

Claims 1-8 and 10-43 are pending in the present application. Claim 9 is canceled. Reconsideration of the application is respectfully requested.

On 8 FEB 2006, Applicants conducted a teleconference with Examiner Honeycutt. Applicants thank the Examiner for making time for the teleconference.

In section 3 of the Office Action, claims 1 - 6, 8, 10, 12 - 15, 17 - 22, 24, 25, 27 - 29, 31 - 36, 38, 39, 41 and 42 are rejected under 35 U.S.C. 102(b) as being anticipated by International Publication No. WO 99/08206 to Sinander (hereinafter "the Sinander publication"). Applicants are traversing this rejection.

The application contains three independent claims, namely claims 1, 17 and 31. During the aforementioned teleconference, Applicants and Examiner Honeycutt discussed the Sinander publication as it relates to claim 1. As a result of the discussion, Examiner Honeycutt indicated that the Examiner wished to review the Sinander publication in greater detail, and so, Applicants and Examiner Honeycutt did not reach any agreement. Below, Applicants are reiterating several points that were discussed during the teleconference.

Claim 1 recites a method for supporting versioning of data in a content management system. The method includes maintaining a first table for storing <u>an identifier</u> of a most recent version of a data item, and maintaining a second table for storing <u>an identifier</u> of an older version of the data item. When the data item is to be updated, (i) <u>the second table is updated</u> to include the identifier of the most recent version of the data <u>from the first table</u>, and (ii) the first table is updated to identify a new version of the data item.

The Sinander publication is directed toward a technique for upgrading a database (page. 1, lines 7 - 8). With reference to FIG. 2b, the Sinander publication describes a new table created to receive data that is stored in an old table (page 5, lines 9 - 12). The old table and the new table contain data to be updated, and during the upgrade, both of the old table and new table are updated (to hold updated data) (page 6, lines 7 - 15). A systemtable (e.g., Table 1) holds references to stored procedures (e.g., base version, target version,

and upgrade version) (page 7, lines 1 - 22). The base version of a procedure is used during normal operation (page 7, lines 23 - 25). The target version of a procedure is used during an upgrade operation (page 8, lines 1 - 6). The upgrade version facilitates the updating of the old (data) table and the new (data) table (page 8, lines 6 - 13).

During the teleconference, Applicants explained that although the Sinander publication discloses the old table, the new table, and the systemtable, the Sinander publication nonetheless fails to disclose the elements of claim 1.

In the Sinander publication, the old table and the new table each holds <u>data</u>, rather than an <u>identifier</u> of a data item. As such, the old table and the new table are not a disclosure of a first table for storing **an** identifier of a most recent version of a data item, and, a second table for storing **an identifier** of an older version of said data item, as recited in claim 1.

The Sinander publication does not disclose a second systemtable, but nevertheless, Applicants and Examiner Honeycutt considered that in the Sinander publication, the target version column of Table 1 could be regarded as a first table, and the base version column of Table 1 could be regarded as a second table. However, even under such an interpretation, the Sinander publication does not teach that the base version column is updated from the target version column. Consequently, the Sinander publication does not disclose that said second table (for storing an identifier of an older version) is updated to include said identifier of said most recent version of said data from said first table (for storing an identifier of a most recent version), as recited in claim 1.

In view of the foregoing, Applicant submits that the Sinander publication does not anticipate claim 1.

Claims 17 and 31 each include recitals similar to that of claim 1, as described above. Accordingly, claims 17 and 31, for reasoning similar to that provided in support of claim 1, are also novel over the Sinander publication.

Claims 2-6, 8, 10 and 12-15 depend from claim 1. Claims 18-22, 24, 25 and 27-29 depend from claim 17. Claims 32-36, 38, 39, 41 and 42 depend from claim 31. By virtue of these dependencies, claims 2-6, 8, 10, 12-15, 18-22, 24, 25, 27-29, 32-36, 38, 39, 41 and 42 are also novel over the Sinander publication.

Applicants respectfully request reconsideration and withdrawal of the section 102(b) rejection of claims 1 - 6, 8, 10, 12 - 15, 17 - 22, 24, 25, 27 - 29, 31 - 36, 38, 39, 41 and 42.

In section 4 of the Office Action, claims 7, 23 and 37 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Sinander publication in view of U.S. Patent No. 6,591,342 to Akkary et al. (hereinafter "the Akkary et al. patent").

Claims 7, 23 and 37 depend from claims 1, 17 and 31, respectively. Applicants submit that the Akkary et al. patent does not make up for the deficiency of the Sinander publication, as the Sinander publication relates to claims 1, 17 and 31. Accordingly, Applicants further submit that claims 1, 17 and 31, and claims 7, 23 and 37, by virtue of their dependencies, are all patentable over the cited combination of the Sinander publication and the Akkary et al. patent.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 7, 23 and 37.

In section 5 of the Office Action, claims 11, 26 and 40 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Sinander publication in view of U.S. Patent Application Publication No. 20020103815 to Duvillier et al. (hereinafter "the Duvillier et al. publication").

Claims 11, 26 and 40 depend from claims 1, 17 and 31, respectively. Applicants submit that the Duvillier et al. publication does not make up for the deficiency of the Sinander publication, as the Sinander publication relates to claims 1, 17 and 31. Accordingly, Applicants further submit that claims 1, 17 and 31, and claims 11, 26 and 40, by virtue of their dependencies, are all patentable over the cited combination of the Sinander publication and the Duvillier et al. publication.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 11, 26 and 40.

In section 6 of the Office Action, claims 16, 30 and 43 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Sinander publication in view of U.S. Patent Application Publication No. 20020073089 to Schwartz et al. (hereinafter "the Schwartz et al. publication").

Claims 16, 30 and 43 depend from claims 1, 17 and 31, respectively. Applicants submit that the Schwartz et al. publication does not make up for the deficiency of the Sinander publication, as the Sinander publication relates to claims 1, 17 and 31. Accordingly, Applicants further submit that claims 1, 17 and 31, and claims 16, 30 and 43, by virtue of their dependencies, are all patentable over the cited combination of the Sinander publication and the Schwartz et al. publication.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 16, 30 and 43.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

2/13/07

Date

Respectfully submitted,

Paul D. Greeley

Reg. No. 31,019 Attorney for the Applicants

Ohlandt, Greeley, Ruggiero & Perle, L.L.P.

One Landmark Square, 10th Floor

Stamford, CT 06901-2682

Tel: 203-327-4500 Fax: 203-327-6401